

**Weil, Gotshal & Manges LLP**

BY ECF

767 Fifth Avenue  
New York, NY 10153-0119  
+1 212 310 8000 tel  
+1 212 310 8007 fax

**Greg A. Danilow**  
+1 212 310 8182  
greg.danilow@weil.com

September 21, 2018

The Honorable Jesse M. Furman  
United States District Judge  
United States District Court  
for the Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

Re: *In re General Electric Company Federal Derivative Litig.*, No. 18-cv-03355 (JMF)

Dear Judge Furman:

We represent Nominal Defendant General Electric Company (“GE”) and the GE directors and officers named as defendants in this action. We write, pursuant to Rule 3.A of Your Honor’s Individual Rules and Practices, on behalf of all parties concerning GE and defendants motion to dismiss plaintiffs’ amended consolidated complaint filed on September 7, 2018 (Dkt. No. 71). The parties have conferred and propose as follows:

Motion to Dismiss Consolidated Complaint. The parties agree that GE and defendants’ August 17, 2018 motion to dismiss plaintiffs’ consolidated complaint (Dkt. No. 67) is moot in light of plaintiffs’ filing of their amended consolidated complaint on September 7, 2018.

Motion to Dismiss Amended Consolidated Complaint Schedule. The parties propose that GE and defendants file their motion to dismiss plaintiffs’ amended consolidated complaint on September 21, that plaintiffs’ file their response to the motion on October 24, 2018, and that reply papers be filed on November 9, 2018.

Page Limits. Due to the nature and number of claims alleged in this action, the Court granted permission in its August 15, 2018 Order (Dkt. No. 65) for the parties to file memoranda of law in support of and in opposition to GE defendants’ motion to dismiss plaintiffs’ consolidated complaint of no more than 30 pages, and a reply memorandum of no more than 15 pages. The parties request the same page limits stated in the Court’s August 20, 2018 Order for GE and defendants’ motion to dismiss plaintiffs’ amended consolidated complaint: 30 pages for memorandum in support of and in opposition to the motion, and 15 pages for the reply memorandum.

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The parties are available to answer any questions.

Respectfully submitted,

  
Greg A. Danilow

cc: All Counsel of Record (by ECF)